19 July 2001

DEFINITION REPORT

MODIFICATION PROPOSAL 22 – Provision of Generator Planned Outage Information to all BSC Signatories

Prepared by the P22 Modification Group on behalf of the Balancing and Settlement Code Panel

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I DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
0.1	14 July 01	Trading Development		First Draft
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Version	Date	Reviewer	Signature	Responsibility
0.1	17 July 01	Chris Rowell		Modification Group
0.1	17 July 01	Nigel Brooks		Modification Group
0.1	17 July 01	Martin Mate		Modification Group
0.1	17 July 01	Lisa Waters		Modification Group
0.1	17 July 01	Tony Ballard		Modification Group
0.1	17 July 01	Duncan Jack		Modification Group
0.1	17 July 01	Rekha Patel		Modification Group
0.1	17 July 01	Dave Warner		ELEXON
0.1	17 July 01	John Williamson		ELEXON

b Distribution

Name	Organisation
Panel	
Modification Group	
BSC Parties	

c Intellectual Property Rights and Copyright

II CONTENTS TABLE

1 SUMMARY AND RECOMMENDATIONS

1.1 Executive Summary

Modification Proposal P22 was submitted on 22 June 2001 by Dynegy UK Limited. The proposal was considered by the Panel on the 28 June together with an ELEXON Initial Written Assessment (IWA). At the Panel meeting ELEXON was actioned to proceed with a Definition Report and present it to the 26 July meeting. This paper, and accompanying attachment, are complete this action.

The proposal seeks remove an apparent asymmetry in the provision of information to BSC Parties by seeking to publish generator Output Useable (availability) and generator Outage information to all BSC signatories via the BMRS.

The Initial Written Assessment for Modification Proposal P22 was issued for industry consideration. 12 responses were received with the majority view supporting the proposal. However the Modification Group were split as to whether the problem actually existed.

Certain parties have argued that it is important to ensure that all parties participating in competitive markets should have access to the same information and that daily margins are of importance to parties participating in electricity forwards markets. The current arrangements give rise to 2 issues that are inconsistent with this, these are:

- Currently **only NGC has access to daily margin data for weeks 7 to 52 (and through to five years ahead)** (through interpolation of weekly data and its access to outage plans).
- While all BSC signatories have access to daily national margins for the period 2 – 14 days ahead (via the BMRS) **only Generators (and NGC) have access to daily national margin data for the period 15 – 49 days ahead** (through summation of zonal data).

These two issues are considered to affect the achievement of BSC objective (c):

> *'promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.'*

A number of additional, less significant, issues were identified during the Definition phase. These were concerned with the detail of the data that the Proposer suggests should be published and whether it, in whole or in part, adequately addresses the issues identified above. These other matters are detailed in the report and could form the basis of a consultation exercise during an Assessment phase.

1.2 Recommendation

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal during the Definition procedure, and the resultant findings of this Definition Report (The Provision of Generator Planned Outage Information to all BSC Signatories), the Modification Group (the Group) recommends that the BSC Panel should:

- Submit Modification Proposal P22 to the Assessment phase.
- The Assessment phase should include an Industry Consultation on the issues outlined in this report.

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd., on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSC Co, as defined in the BSC.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk

2.1 Background

Modification Proposal P22 was raised by Dynegy UK Limited on the 22 June 2001 and subsequently considered by the Panel on the 28 June 2001, where it was agreed that ELEXON should proceed with a Definition Report.

3 PURPOSE AND SCOPE OF THE REPORT

BSC Section F sets out the procedures for progressing proposals to amend the BSC (known as 'Modification Proposals'. These include procedures for proposing, consulting on, developing, evaluating and reporting to the Authority on potential modifications.

The BSC Panel is charged with supervising and implementing the modification procedures. ELEXON provides the secretariat and other advice, support and resource required by the Panel for this purpose. In addition, if a modification to the Code is approved or directed by the Authority, ELEXON is responsible for overseeing the implementation of that amendment (including any consequential changes to systems, procedures and documentation). The Panel may decide to submit a Modification Proposal to the 'Definition Procedure'[1]. In such cases, the Panel commissions a Modification Group to define the issues raised by a Modification Proposal in sufficient detail to enable the Panel to determine whether to:

a) Refer the proposal back to the Modification Group for further analysis; or

b) Submit the proposal to the Assessment Procedure[2]; or

c) Proceed directly to the Report Phase[3].

The Modification Group is therefore tasked with reviewing the Modification Proposal with a view to providing clarification and definition where there is insufficient detail in the proposal to allow the Panel to decide whether to proceed with a detailed evaluation. The Modification Group must prepare a written report for the Panel that sets out the following matters[4]:

a) An assessment of the issues raised by the Modification Proposal with supporting information and data to explain the effect of such issues by reference to the Applicable BSC Objective(s)[5] and a summary of such assessment;

b) An analysis of and the views and rationale of the Modification Group as to whether (and, if so, to what extent) the issues raised by the Modification Proposal warrant further assessment and evaluation under the Assessment Procedure;

c) A detailed summary of the representations made by Parties and interested third parties during any consultation undertaken by the Modification Group and the comments and views of the Modification Group in respect thereof;

d) A summary of any analysis prepared by the Transmission Company and the comments and views of the Modification Group in respect thereof;

e) A summary of the analysis prepared by relevant BSC Agents and the comments and views of the Modification Group in respect thereof;

f) Where applicable, a copy of the terms of reference and a summary of any report or analysis of external consultants or advisers; and

g) Such other matters as the Panel may require in the terms of reference of the relevant Modification Group.

This Definition Report therefore addresses all of the above items to the extent relevant to the Modification Proposal in question.

[1] See BSC F2.5
[2] See BSC F2.6
[3] See BSC F2.7
[4] See BSC F2.5.4
[5] As defined in the Transmission Licence

4 MODIFICATION GROUP DETAILS

This Definition Report has been prepared by the Reporting Modification Group. The Membership of the Modification Group who held a meeting to consider this Proposal on 11 July 2001 was as follows:

Chris Rowell	ELEXON (Chairman)
Lisa Waters	Dynegy (Proposer)
Rekha Patel	Dynegy
Martin Mate	British Energy
Terry Ballard	Innogy
Duncan Jack	St Clements Services
Nigel Brooks	NGC
Tony Doherty	Ofgem
Tim Pearson-Young	ELEXON

5 THE PROPOSAL SUMARISED

Dynegy UK Limited raised Modification Proposal P22 on the 22 June 2001. It is proposed that two new data sets are obtained from NGC and published on the BMRS. These are:

1. Output Usable (generation availability); and
2. Generator Planned Outage Data.

It is proposed that this data be sourced from NGC and published on the BMRS in the same timescales as currently defined in the Grid Code (outlined in section 5.2.2).

5.1 Rationale

The Proposers rationale for the publication of the two data sets, summarised above, is slightly different although both hinge upon the idea that the current arrangements, under the Grid Code, for the provision and publication of this data result in an asymmetry of market information. This asymmetry, it is argued, results in the potential for a commercial advantage to arise, for the companies who have access to this information, when trading in forwards and futures markets.

A short summary of the different arguments for the publication of Output Usable and Outage information is presented below.

5.1.1 Output Useable

It is argued that because Output Usable data, on a zonal basis, is available to generators and not to non-generator BSC Parties that an asymmetry in the provision of market information between these two types of company (generators, non-generators) exists which may give rise to a distortion in forwards and futures markets.

5.1.2 Outage Information

It is also argued that; as only NGC has access to generator Outage information an asymmetry exists between NGC and all other BSC signatories that may give rise to a distortion in forwards and futures markets.

5.2 NGC Current Practice

OC2 of the Grid Code codifies the treatment of generator Output Useable and outage information to and from NGC. This section of the report seeks to provide a high level view of NGC current practice to aid understanding. Readers should refer to the Grid Code for a full and complete explanation.

Collection and dissemination of generator Output Useable data is described by reference to 5 separate time frames. These time frames are listed below (A) together with, (B) the inbound frequency, (C) a description of data received by NGC, (D) the outbound frequency of data sent to relevant generators and (E) a description of the outbound data received by generators.

Table 1

	A) Time frame	B) Inbound Frequency	C) Inbound Data	D) Outbound Frequency	B) Outbound Data Resolution
1	2 – 14 days ahead	Daily	Daily Output Usable by Genset	Daily	Daily Zonal Margin by NGC Zone[6]
2	2 – 49 days ahead	Weekly	Daily Output Usable by Genset	Weekly	Daily Zonal Margin by NGC Zone
3	2 – 52 weeks ahead	Weekly	Weekly Output Useable and Outage start end date by Genset	Weekly	Weekly Zonal Margin by NGC Zone
4	1 - 2 years ahead	6 Monthly	Weekly Output Useable and Outage start end date by Genset	6 Monthly	Weekly Zonal Margin by NGC Zone
5	3 – 5 years ahead	6 Monthly	Weekly Output Useable and Outage start end date by Genset	6 Monthly	Weekly Zonal Margin by NGC Zone

To illustrate the table above we provide additional detail associated with row 1.

1. Prior to 11:00am each generator is required to provide NGC with daily Output Usable (peak half hourly availability per day) for 2-14 days ahead (for the weekly data, rows 3-5, the start date and end date of any planned outage scheduled to occur during the period is also required). This information can either be provided over the NGC Electronic Data Transfer (EDT) network or by fax (NGC will then manually input all data received by fax). An example is provided in Annex 1.
2. NGC collate all the information provided and perform a series of validation checks to identify missing data and errors.
3. Prior to 16:00 the same day NGC send via EDT (the volume of daily data limits the use of fax transmission for daily data) aggregated zonal margin data (summed for all gensets in a particular zone) to the relevant companies (those with gensets in those zones). An example is provided in Annex 1

5.2.1 Additional Points Regarding Current Practice

In addition, the following points are thought to be worthy of note:

- 2-14 day ahead National Margin forecast (OCNMFD) is currently published on the BMRS consistent with section V of the BSC. This data is provided by NGC, consistent with section BC1.5.2 of the Grid Code.
- Year ahead weekly National Margin forecast (OCNMFW) is currently published on the BMRS consistent with section V of the BSC. This data is provided by NGC, consistent with section BC1.5.2 of the Grid Code.

[6] The 'NGC Zones' referred to here are NGC defined and are subject to dynamic change. Further more NGC do not currently publish the definitions of these zones.

- Generators may request from NGC zonal margin data for zones other than those which they have gensets.
- The zones referred to in this report are NGC defined zones that are subject to change and whose definitions are not currently published by NGC.

6 ISSUES RAISED BY THE PROPOSED MODIFICATION

This section provides an assessment of the issues raised by the Proposed Modification with supporting information and data to explain their effect. Where appropriate reference is made to the Applicable BSC Objectives.

The Applicable BSC Objectives (as defined in the Transmission Licence) are:

(a) the efficient discharge by the Licensee of the obligations imposed upon it by the licence;

(b) the efficient, economic and co-ordinated operation by the Licensee of the Licensee's Transmission System;

(c) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity; and

(d) promoting efficiency in the implementation and administration of the balancing and settlement arrangements

The issues identified in this section of the report are separated into those that may arise as a result of the arguments underpinning the Modification Proposal, these are outlined under the heading 'first order issues', and those that are considered to arise from the detail of the Proposal, outlined under the heading 'second order issues'. These are set out below.

6.1 First Order Issues

6.1.1 Market Asymmetry

2 alternative views of what market asymmetry might be important to consider in relation to the access of Output Usable and Outage data have been expressed. These are:

- NGC versus and all other BSC signatories; and
- Generators versus non generators.

If the view that a useful distinction should be made between these two types of asymmetry, it would be appropriate to consider the two separately and potentially identify separate solutions. It is recommended this issues be consulted upon during the Assessment phase.

Certain parties have argued that it is important to ensure that all parties participating in competitive markets should have access to the same information and that daily margins are of importance to parties participating in electricity forwards markets. The current arrangements give rise to 2 issues that are inconsistent with this, these are:

- Currently **only NGC has access to daily margin data for weeks 7 to 52 (and through to five years ahead)** (through interpolation of weekly data and its access to outage plans).
- While all BSC signatories have access to daily national margins for the period 2 – 14 days ahead (via the BMRS) **only Generators (and NGC) have access to daily national margin data for the period 15 – 49 days ahead** (through summation of zonal data).

These two issues are considered to affect the achievement of BSC objective (c).

6.1.2 Market Information

Further consideration should be given to legal issues associated with the publication of 'market information' and whether, from a competition perspective, the provision of more or less market information is desirable.

6.2 Second Order Issues

This section provides a description and commentary on the issues associated with the detail of the Modification Proposal. The list below should not be considered as exhaustive but a description of those issues that have become apparent thus far. It is reasonable to consider that additional maters will emerge during the Assessment phase of this Proposal.

Distinguishing between Output Usable and Outage Information: The extent to which Output Usable and Outage information differs, on a practical basis, should be considered further. Outage information, arguably, does not add anything to daily Output Usable data as any outage plans are already taken account in the provision of daily Output Useable figures. Outage information in conjunction with weekly Output Usable figure allows, through interpolation of weekly data and consideration of Outage start and end dates, for more accurate daily figures to be calculated. It may therefore be considered reasonable for an additional data set to be created and disseminated as an alternative; daily margins. It is recommended that this is consulted upon during the Assessment phase and whether extending the publication of daily national margin data would adequately, or better, address the concerns at the heart of this proposal.

Data Resolution: It is proposed that Output Useable data be published in the same format as it is currently available to generators i.e. aggregated to NGC zone. However, it is a matter for debate at to whether this is the most appropriate level of resolution particularly as the NGC zones referred to are subject to change and are not currently published. We understand that some of the NGC zones include only one genset giving rise to potential concerns about inequitable access to, arguably, commercially sensitive data. It may be argued that an alternative level of aggregation may adequately address the issue at the Proposal is designed to address. Options that are immediately apparent include:

- Publish non-aggregated Output Usable and Outage data for each genset
- Publish Output Usable and Outage data by NGC zone
- Publish Output Usable and Outage data aggregated by the 5 BMRS zones.

Clearly a combination of the above examples could be identified, additionally it may be considered that alternative levels of temporal resolution to those currently published are be more appropriate.

It may also reasonably be argued that Outage data relating to specific gensets is commercially confident, as some of the NGC zones are thought to contain only one genset confidentiality issued can be expected to arise if the modification is progressed on the NGZ zone basis.

Data Accuracy: It may be argued that the accuracy and or quality of data passed to NGC may change if the distribution changed. Some Group members noted the potential for a perverse incentive to arise where by generators may gain from providing inaccurate or misleading Output Useable and or Outage information. This necessarily raises questions of policing and providing appropriate incentives to ensure accuracy that do not unfairly penalise legitimate unforeseen events.

Data Consistency: Observing the definitions of data items, provided in Table 2, it can be that data items are defined either by reference to a genset or BMU. In summary some data governed by OC2 of the Grid Code is not equivalent to data items defined and governed by the Balancing and Settlement Code (BSC).

It is recommended that inconsistency and the extent to which it might give rise to material issues should be considered further and consulted upon in the Assessment phase.

Table 2

Term	Document Reference	Definition	Observation
Maximum Export Limit (MEL)	Grid Code BC1 Appendix 1	A series of MW figures and associated times, making up a profile of the maximum level at which the **BM Unit** may be exporting (in MW) to the **NGC Transmission System** at the **Grid Entry Point** or Grid Supply Point, as appropriate.	Associated with a BM Unit
Generating Plant Demand Margin (OCNMFD)	BSC Annex X2	Has the meaning given to that term in OC2 of the Grid Code	Associated with a Genset 2-14 day ahead National Margin forecast (OCNMFD), a daily peak half hour value, is published on the BMRS. The data is sourced from NGC.
Generating Plant Demand Margin (OCNMFD)	Grid Code – Definitions and Glossary	The difference between **Output Usable** and forecast **Demand**	Associated with a Genset
Output Usable (OU)	Grid Code – Definitions and Glossary	That portion of **Registered Capacity** which is not unavailable due to a **Planned Outage** or breakdown	Associated with a Genset
Indicated Margin	Grid Code – Definitions and Glossary	The difference between the sum of **BM Unit MEL** submitted and the forecast of **Demand** for the whole or any part of the **System**	Associated with a BMU The Grid Code, BC 1 Appendix 2, places an obligation on NGC to provide this data to the BMRAS

Governance: NGC noted that there are issues associated with the governance under which Output Useable or Outage information are currently collected. Currently these two data sets collected under OC2 of the Grid Code are therefore considered to be for NGC planning purposes. Clearly options exist for the collection and publication of this data that do not include NGC, such as dual provision to both NGC and ELEXON. Although this may, arguably, introduce additional problems. We note that information is currently sourced from NGC and passed to the BMRS for publication under provisions in

the BSC and the Grid Code. These provisions include section V of the BSC and Appendix 2 of BC1 of the Grid Code (Data To Be Made Available by NGC).

Generator Types: During the Modification Group discussions one member commented that the nature of outages can be very different depending on the type of plant concerned. For example the predictability, lead time and duration of outages of 'baseload' plant would be very different to those of 'peaking' plant. It may therefore be worth considering if a distinction should be drawn between the outage data provided by different types of generating plant.

Timing of Implementation: During the Modification group discussions one member commented that it would be useful to have the Proposal implemented, in whatever form, such that use could be made of at least some of the information relating to the summer outage plans. If sufficient weight was attached to the need to implement this Proposal in time to make available, at least some, summer outage plans may mean that practical issues associated with the development of the Proposal and subsequent development and implementation of the solution might give rise to the need to consider an interim solution.

7 THE NEED FOR FURTHER ASSESSMENT AND EVALUATION

The Modification Group believe the Modification Proposal is sufficiently well defined to be taken forward to the Assessment phase. However, it is considered to be a matter for debate as to whether the Modification Proposal, in whole or in part, adequately addresses the issues identified in section 6.

Moreover it is also considered to be necessary to consult on whether the issues outlined in section 6 are indeed material issues, consistent or not with Applicable BSC objectives.

7.1.1 Recommendation for Further Work

It is recommended that the issues outlined in section 6 of this report be considered further, and where appropriate, consulted upon during the Assessment phase.

8 REPRESENTATIONS BY PARTIES AND INTERESTED THIRD PARTIES

8.1 Summary of Representations

Twelve responses were received in total, including a response from the Proposer. Of these responses 6 were from companies that have a generation licence and 6 were from companies that do not have a generation licence including 1 from the Transmission Company.

- Seven respondents supported the Modification Proposal whilst making a number of additional observations and a further two respondents, whilst they did not support the Proposal in its current form, indicated that if the Proposal was aimed at only the dissemination of zonal margin data, it would, in principle, be supported.
- Two respondents did not support the Modification Proposal.
- One respondent did not explicitly state a preference but the tone of the response was not in favour of the Modification Proposal.

The following supplementary issues were raised by the respondents:

i. Three respondents explained that outage information was not currently passed to generators, i.e. that the assertion in the original Proposal was incorrect.

ii. Two respondents agreed with the response from the Proposer that the Modification Proposal would help to provide for more equal competition.

iii. Three respondents pointed to the national system margin data already published on the BMRS and indicated that this was sufficient.

iv. Three respondents commented that the publication of outage information might have an impact on the accuracy of the information provided to NGC and the potential for gaming issues to arise.

v. Two respondents noted that the information is currently provided under the Grid Code, which includes a clause limiting the use of such information for commercial gain.

vi. Two respondents commented that NGC does / should have 'Chinese walls' in place to limit their use of both Output Usable and Outage information.

vii. One respondent indicated that if the Proposal proceed an argument for publishing interconnector flows, transmission and distribution outages and constraints would be put forward.

All consultation responses can be found in Annex 2.

8.2 Comments and Views of the Modification Group

The Reporting Modification Group met on the 11 July 2001 to consider the Proposal together with the consultation responses resulting from the publication of the Proposals Initial Written Assessment.

8.2.1 Group Comments on Consultation Responses

The Modification Group made no material comments on the responses received from consultees.

8.2.2 Group Comments

The Group was broadly split in to two camps regarding the appropriateness of the Modification; those in favour and those who were not. Of those that were not in favour of the Modification Proposal (or variant) the majority did not accept that there was necessarily a problem that needed to be addressed.

During the discussions the Group identified a number of issues associated with the publication of the data that forms the basis of the Modification Proposal. These issues are included in the discussion in section 6.

9 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

No additional input, over and above their response to the consultation and their involvement in the Modification Group, was requested from the Transmission Company. Details of the their input can be found in the relevant sections in this report.

ANNEX 1 – SUPPORTING INFORMATION AND DATA

d EXAMPLE OF TYPICAL WEEKLY 'OUTPUT USEABLE' SUBMISSION

2 - 52 WEEKS AHEAD
OUTPUT USABLE FORECAST AT WEEKLY PEAK
FOR THE PERIOD COMMENCING 22 MARCH 2000

DATE: 10 March 2000

WEEK NO	MODULE 1	MODULE 2	OUTAGE REF	WEEK NO	MODULE 1	MODULE 2	OUTAGE REF
12W2000	135	135		38	125	125	
13	135	135		39	125	125	
14	135	135		40	125	125	
15	135	135		41	0	125	1
16	135	135		42	0	0	2
17	135	135		43	125	75	3
18	125	125		44	125	125	
19	125	125		45	125	125	
20	125	125		46	125	125	
21	125	125		47	125	125	
22	125	125		48	125	125	
23	125	125		49	125	125	
24	125	125		50	125	125	
25	125	125		51	125	125	
26	125	125		52	125	125	
27	125	125		01W2001	125	125	
28	125	125		02	125	125	
29	125	125		03	125	125	
30	125	125		04	125	125	
31	125	125		05	125	125	
32	125	125		06	125	125	
33	125	125		07	125	125	
34	125	125		08	125	125	
35	125	125		09	125	125	
36	125	125		10	125	125	
37	125	125		11	125	125	

Outage Ref	1	2	3
Comment	Module 1	Modules 1 & 2	Mod. 2 - GT 1

Duration	**5 days**	**2 days**	**7 days**
Start	**11/10/94**	**20/10/94**	**25/10/94**
Finish	**15/10/94**	**21/10/94**	**31/10/94**

Note: The above figures (8-52 weeks ahead) are gross-net-net with a 5.9% breakdown allowance applied to both Modules 1 & 2.

e EXAMPLE OF TYPICAL WEEKLY ZONAL MARGIN DATA SENT TO RELEVENT GENERATORS

NATIONAL GRID COMPANY TABLE 4EEE
FRED'S POWER GENERATION REQUIREMENTS FOR CURRENT YEAR (8-52 WKS AHEAD)
IN EXPORTING ZONE XXE
AS AT 12.22.32 ON 16/12/2000

WK NO	MAX. GEN USABLE	FRED'S POWER	TOTAL AVAIL.	GEN. SURPLUS	PROBLEM WEEKS
6	33001	345	32309	-693	
7	32931	345	32226	-705	
8	32825	345	32076	-749	
9	32673	0	31873	-800	
10	32697	0	31934	-763	
11	32679	345	31918	-761	
12	31600	345	31904	304	***
13	31500	345	31829	329	***
14	31450	345	31965	515	***
15	31313	345	31718	405	***
16	31209	345	31669	460	***
17	31106	345	31761	655	***
18	31223	345	31619	396	***
19	31303	345	31493	190	***
20	31312	345	31442	130	***
21	32581	345	31634	-948	
22	32112	345	31064	-1048	
23	32376	345	31523	-853	
24	32428	345	31561	-867	
25	32401	345	31503	-898	
26	32437	345	31451	-986	
27	32414	345	31455	-959	
28	32405	0	31447	-958	
29	32299	0	31336	-963	
30	32326	345	31330	-996	
31	31975	345	30825	-1150	
32	32091	345	31017	-1074	
33	32259	345	31221	-1038	
34	32340	345	31320	-1020	
35	32438	345	31327	-1111	
36	32318	345	31164	-1154	
37	32356	345	31189	-1167	
38	32412	345	31289	-1123	
39	32551	345	31445	-1106	
40	32698	345	31610	-1088	
41	32394	345	31289	-1105	
42	32310	345	31246	-1065	
43	32180	345	31201	-980	

44	32361	345	31508	-853	
45	32473	345	31659	-814	
46	32706	345	31913	-793	
47	32578	345	31852	-726	
48	32780	345	32114	-666	
49	32572	345	31862	-710	
50	32730	345	31942	-788	

ANNEX 2 – CONSULTATION RESPONSCES

Responses from P22 IWA Consultation

Representations were received from the following parties:

No	Company	File Number
1.	Northern Electric	P22_DEF_001
2.	Edison Mission	P22_DEF_002
3.	BP Gas Marketing	P22_DEF_003
4.	TXU Europe Energy Trading	P22_DEF_004
5.	Innogy	P22_DEF_005
6.	British Energy	P22_DEF_006
7.	SEEBOARD	P22_DEF_007
8.	Powergen	P22_DEF_008
9.	Scottish and Southern Energy Group	P22_DEF_009
10.	The European Power Source Company (U.K.) Limited	P22_DEF_010
11.	Dynegy	P22_DEF_011
12.	NGC	P22_DEF_012

P22_DEF_001 – Northern Electric

Modifications
ELEXON
3rd Floor
1 Triton Square
London
NW1 3DX

Dear Sir

Modification Proposal P22:

The Provision of Generator Planned Outage Information to all BSC Signatories

Northern Electric welcomes the opportunity to comment on the modification for the Provision of Generator Planned Outage Information to all BSC Signatories.

Having considered the options outlined in the 'Initial Assessment of Modification Proposal P22', Northern Electric strongly supports Modification Proposal P22.

We note that Modification P22 is being submitted to a Modification Group under the definition procedure as section F2.5 of the BSC and we look forward to the outcome of the deliberations of this Group.

Yours faithfully

Trevor Wills
Energy Analyst

P22_DEF_002 – Edison Mission

From: Libby Glazebrook[SMTP:LGlazebrook@edisonmission.com]
Sent: 04 July 2001 12:33
To: modifications@elexon.co.uk
Cc: Nigel Hawkins
Subject: Comments on modifiaction P22 - Provision of Generator Planned Outage to all BSC Signatories

Edison Mission Energy has no objections to aggregated outage information submitted by generators as a requirement of OC2 of the Grid Code being made available to all market participants.

regards

Libby Glazebrook
Edison Mission Energy
0870 238 5558

P22_DEF_003 – BP Gas Marketing

From: Simons, Mark C[SMTP:SIMONSMC@bp.com]
Sent: 05 July 2001 18:21
To: 'modifications@elexon.co.uk'
Subject: P22 Definition Comments

BP Gas Marketing Ltd support the introduction of modification P22 – The Provision of Generator Planned Outage Information to All BSC Signatories.

In relation to the manner by which this information is disseminated we would recommend that The Panel adopt the following option :
Provison of the information by NGC to BMRA for publication on the BMRS

Many thanks,

Mark Simons

BP Gas Marketing Ltd

Tel : 020 7579 7593
E-mail : simonsmc@bp.com

P22_DEF_004 – TXU Europe Energy Trading

TXU Europe Energy Trading
UK Trading

Gareth Forrester
Modifications Manager

06 July 2001
Dear Gareth

MP 22: The Provision of Generator Planned Outage Information to All BSC Signatories

Thank you for the opportunity to comment on the above modification proposal. TXU Europe Energy Trading Ltd would like to make the following comments on behalf of all TXU Europe companies.

Generators do not receive planned outage information from NGC. The information that generators receive is based on availability and local margins, should Dynegy wish to extend the distribution of this information then we would be willing to support a modification that proposed this. However, we do not believe that all parties should receive generators planned outage information.

Currently we provide details of our plant outages to NGC for planning purposes. This information is not passed on to other generators and nor do we believe it should be as it is commercially sensitive. We do not believe that it is appropriate for all parties to receive details of generator outages, as it would reveal commercially sensitive information relating to parties' positions resulting in unfair trading advantages to those BSC parties who do not have upstream assets.

We hope you have found our comments useful and should you wish to discuss any aspect of this response further please do not hesitate to contact me on the above number.

Yours sincerely

Nicola Lea
Market Development Analyst

TXU Europe Energy Trading Limited. Registered Office: Wherstead Park, Wherstead, Ipswich, Suffolk, IP9 2AQ England.
Registered in England No. 3116221.

P22_DEF_005 - Innogy

The Provision of Generator Planned Outage Information to all BSC Signatories

Innogy does not support this proposal in its current form.

1. The provision of data under OC2 was intended for system planning purposes only. The concern expressed by the proposer regards its potential use by NGC for trading activities is a valid one and assurances should be sought that such data is not communicated further within NGC in its raw form.

2. We believe, in contrast to the proposer, that NGC do not communicate outage information of competitors to other generating companies. Any feedback from System Operator to Generator/Network Operator is specifically regarding operational issues affecting their own plant/systems only or in the form of zonal margin data.

3. There are specific clauses within OC2 precluding the use of information supplied to Network operators for any use other than for operational purposes.

4. Aggregate information in the form of system margins into the future is already published via BMRS "forecast". Longer term information on this and other system related issues is already in the public domain via NGC seven year statement available in both hard copy and via NGC website but could be published on BRMS in a similar manner.

5. If it was considered to be suitable market information, zonal margin data distributed under terms of OC2 could be released by the System Operator to BSCCo for publication in a similar way.

6. The timing of planned outages will be influenced by individual generators commercial position/views and as such should be treated as commercially confidential. The proposal contains nothing to justify the release of this information at any more detail than was available pre NETA i.e. system and zonal margin data.

7. The information supplied to System Operator is done on the basis of specific licence obligations under the Grid Code OC2. On what basis would this information be supplied to BSCCo? There could be a risk of information providers become accused of market gaming if market participants rely unduly upon information that is currently non-binding under present obligations.

8. On what basis would we ensure that the same information is supplied to SO and BSCCo if this is what is required?

9. Not withstanding the above, if the intention is to proceed, then it would be argued that interconnector flows and system outages/constraints at both NGC and Distribution Network Operator level are of equal significance to market participants to ensure a level playing field.

P22_DEF_006 – British Energy

From: Ace Rachel[SMTP:rachel.ace@british-energy.com]
Sent: 06 July 2001 13:24
To: 'modifications@elexon.co.uk'
Subject: P22 Definition Comments

To: Modification Secretary, Elexon

From: Rachel Ace, British Energy, 6 July 2001

British Energy does not support Modification P22.

Publishing of forward plans of outages for individual plants outage would not be in the interests of a well functioning efficient market. Such information has the potential to mislead market participants as outage plans can be subject to change, often at short notice. If forward plans were required to be published, it would also create an opportunity for parties to abuse their position through publishing incomplete or inaccurate information.

Under the existing provisions of the Grid Code, OC2 information provided to NGC should not be used for commercial gain. This applies also to NGC, and a "Chinese-wall" should already be in place at NGC, so that Dynegy's point of principle - that NGC can exploit an information advantage - is already covered by existing code rules.

British Energy believes that it is preferable for the market to operate with a level playing field in terms of information, and that details of forward outage plans at the individual plant level should remain commercially confidential to the owners of the plant.

Regards

Rachel Ace

For
British Energy Power and Energy Trading
British Energy Generation Ltd
Eggborough Power Ltd

P22_DEF_007 - SEEBOARD

From: Morton, David[SMTP:DMorton@seeboard.com]
Sent: 06 July 2001 15:59
To: 'Elexon Modifications'
Subject: P22 Definition Comments - SEEBOARD

SEEBOARD supports modification proposal P22.

We agree with modification proposer that there exists an asymmetry of information. Generators and NGC have access to price sensitive information that is currently not available to all participants. This gives some players an unfair advantage and results in market inefficiencies.

Although an assessment is required regarding usefulness of the exact information to be published it is our view that because NGC's activities in the balancing mechanism are location specific, that station specific outage and zonal margin information should be made available. However, aggregated information should also be made available.

An obligation already exists on generators to provide planned outage information to NGC. Our only comment is that information should be provided in least costly and onerous manner that ensures accuracy and timeliness. Our initial view is that an obligation on NGC to publish such information on their website would achieve these requirements.

We are still examining legal issues surrounding this proposal. It is unlikely that these will be available until after the deadline set on this proposal. Once these are available we will forward them to Elexon provided they are available shortly after the deadline for this proposal.

Dave Morton
SEEBOARD
0190 328 3465

P22_DEF_008 – POWERGEN

9th July 2001

Dear Gareth,

Proposed Variation to BSC – Modification Proposal No: P22

Powergen welcomes this opportunity to make initial comments on the modification proposed.

1. Powergen does not support this modification raised by Dynegy in respect of Provision of Generator Planned Outage Information to all BSC Parties.

2. Outage data is submitted to NGC to help maintain system security. It should be noted that such information is only indicative and is not a guarantee of generators future actions. The generators receive only aggregated zonal information in return. All BSC signatories can already receive both short and longer term aggregated system margin data by accessing the bmreports.com website.

3. Prior to the introduction of NETA, the provision of information exchange with the system operator was discussed and the current arrangements were the agreed result. Powergen does not believe that this modification warrants utilising scarce Elexon resources at this point in time.

Yours Sincerely
C A Price

Strategy & Regulation
Energy Trading
Powergen
02476 42 5253.

P22_DEF_009 – Scottish and Southern Energy Group

From: Beverley Grubb[SMTP:Beverley.Grubb@scottish-southern.co.uk]
Sent: 09 July 2001 12:05
To: modifications@elexon.co.uk
Subject: P22 Definition Comments

Please find below a response on behalf of Southern Electric, Scottish and Southern Energy, Keadby Generation and SSE Energy Supply Limited.

In principle, SSE supports this Modification Proposal. It is our belief that the provision of such information could ensure participants are competing on a more equal basis with equal access to information which would allow them to make a more informed decision e.g in relation to potential constraints. In this way the proposal could promote more effective competition.

We note the Modification Proposal suggests participants should provide planned outage information directly to BSCCo at the same time it is provided to NGC. However the Initial Assessment Report lists alternatives, including the suggestion that NGC publish information on their own website. The advantages and disadvantages of both options need to be assessed in more detail along with the other issues listed in the report. If the NGC option is to be given serious consideration, clarification is required in relation to procedures for implementing such arrangements. I presume such arrangements would have to be implemented through the Grid Code or CUSC, rather than the Balancing and Settlement Code. Elexon and the BSC Panel would presumably have no power to determine on such matters.

Regards

Beverley Grubb
Market Development

P22_DEF_010 – The European Power Source Company (U.K.) Limited

From: Teverson, Christopher[SMTP:Christopher.Teverson@gs.com]
Sent: 08 July 2001 22:53
To: 'Modifications@elexon.co.uk'
Subject: P22 Definition Comments

The European Power Source Company (U.K.) Limited

Peterborough Court
133 Fleet Street
London EC4A 2BB

8th July 2001

Response to Consultation on Modification Proposal P22: The Provision of Generator Planned Outage Information to all BSC Signatories

Dear Sir,

Thank you for the opportunity to comment on Modification Proposal P22: The Provision of Generator Planned Outage Information to all BSC Signatories. The European Power Source Company (U.K.) Limited ("EPSCO") supports this modification proposal.

Generator outages impact on system prices and the timely release of this outage information, to all BSC Signatories, in an equitable manner will promote effective competition in the generation and supply of electricity.

Yours faithfully,

Anthony J Gordon
Director

P22_DEF_011 – Dynegy

6 July 2001

Dear Gareth,

Modification Proposal P22: The provision of generator planned outage information to all BSC signatories.

Dynegy would like to make the following comments to the Modification Group that seeks to clarify P22. Dynegy proposed this modification as we are committed to achieving open and transparent energy markets where effective competition will deliver the greatest benefits to consumers. We consider the relevant objectives of Condition 7a of NGC's transmission licence will be furthered by implementation of this modification.

It is our understanding that generators receive the national aggregate and zonal information of generator's planned outages. The zonal information is restricted to the zone in which the generator is located within, however a generator can request data relating to other zones and therefore has the ability to receive all zonal outages. The generators receive zonal plant availability daily, working days, 2-14 days ahead and 2-52 weeks ahead. Dynegy proposes that this asymmetry of information is addressed through publication of exactly the same information by the BSCCo, via the Balancing Mechanism Reporting Services (BMRS). Dynegy consider that the exact nature of the information provided to generators by NGC be requested direct from NGC, rather than BSC signatories that do not receive this information ate present.

Instead of providing an exhaustive list of the information that Dynegy, as the proposer of modification P22, would like to see published, it is perhaps easier to state that the same information that is provided to generators should be provided to all BSC signatories. Dynegy see merit in assessing the costs of the proposal, but set against an analysis of the benefits delivered from an efficiently operated system and the advantages of protecting the interests of consumer.

Dynegy also consider that it is possible that withholding this information from parts of the market could potentially be distorting forward traded markets.

Dynegy believe P22 will promote competition in the sale and purchase of electricity by creating a level playing field for competition. One of the key factors in securing a level playing field on which effective competition can develop is the dissemination of market information between all market participants. Dynegy were perplexed to learn that the publication of generators' planned outage information is potentially outside of the BSC Panel's remit. We question this on the basis that the modification better fulfils the requirement of condition 7A.3(c) of the transmission licence. The provision of market information should be considered as an essential and important section of the BSC, overseen by the BSC Panel, to ensure a transparent and efficient electricity market. By deciding that the publishing of such market data through modifications to the BSC leads to the Panel being "ultra vires", would be detrimental to the development of competition within the electricity market, and the objectives driving NETA.

If you would like to discuss any aspect of P22, then please do not hesitate to contact me on 020 8334 7267.

Rekha Patel
Power Regulatory Analyst

cc: Nick Simpson, Ofgem

P22_DEF_012 – NGC

Comments from National Grid Company regarding the Initial Assessment of Modification Proposal P22 – *The Provision of Generator Planned Outage Information to all BSC Signatories*

Summary

The day ahead national margin forecast (OCNMFD) for 2-14 days ahead, and the week ahead national margin forecast (OCNMFW) for 2-52 weeks ahead, are already published on the BMRS. Hence the relevant data is already published.

Under the Grid Code we receive information on generation availability which is essential to for the operation the Transmission System. In order to allow Generators to assess whether their generation availability is causing any system issues we send back limited aggregated information to generators (see Issue (c) below).

Relevant BSC Objectives

One of the justifications for Modification Proposal P22 is a quote from clause (iii) in paragraph 1.2.1(b) of section B of the BSC "promote effective competition in the generation and supply of electricity". However when making a balanced assessment of this proposal consideration should be given to the full range of objectives in paragraph 1.2.1(b) of section B of the BSC which is quoted in full below:

"1.2.1 The Panel shall conduct its business under the Code with a view to achieving the following objectives:"

"(b) that the Code is given effect in such manner as will facilitate achievement of the objectives (so far as applicable to the manner in which the Code is given effect) set out in Condition 7A(3)(a) to (c) of the Transmission Licence, namely:

(i) the efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence;

(ii) the efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System, and

(iii) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase (as defined in the Transmission Licence) of electricity;"

The Modification Proposal also makes reference to the Grid Code, the relevant objectives of the Grid Code are given in section OC2.1.1:

"OC2.1.1 Operating Code No. 2 ("OC2") is concerned with:

(a) the co-ordination of the release of Gensets, the NGC Transmission System and Network Operators' Systems for construction, repair and maintenance;

(b) provision by NGC of Generating Plant Demand Margins both for national and zonal groups;

(c) the provision by Generators of Generation Planning Parameters for Gensets, including CCGT Module Planning Matrices, to NGC for planning purposes only; and

(d) the agreement for release of Existing Gas Cooled Reactor Plant for outages in certain circumstances."

It is clear that information provided by generators under the Grid Code is important for "efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System" and the "efficient discharge by the Transmission Company of the obligation imposed under the Transmission License"

Issues about Modification Proposal P22

a) It is self evident that any modification proposal should be considered against the full range of objectives in Section B of the BSC. We are concerned that requirements on Generators to provide outage information to BSC Co should not provide perverse incentives on generators to restrict the quality and quantity of information exchanged between Generators and the Transmission Company under the Grid Code.

b) It does not acknowledge the current arrangements for the publication of daily national generation margins on the BMRS for 2 – 14 days ahead, and BMRS publication weekly national generation margins for the period 2 – 52 weeks ahead.

c) The proposal does not acknowledge that the current arrangements in the Grid Code only provide information to Users to the extent that they have control of relevant equipment. Detailed generation outage plans are not currently released under the Grid Code. Transmission zonal limits are calculated and information is released to a User relating to the availability their own generation sets, and the total generation availability and margin in each zone. The release of information is limited to that information which Users need to assess whether it is necessary for the Users to adjust their own outage plan to comply with the Grid Code.

d) The modification Proposal does not clearly specify either the exact time periods for which publication of generator outage data is requested, or the exact form in which publication is requested. Furthermore the proposal does not consider whether the BSC vires is sufficient to require generators to submit this data to BSCCo.

e) During the NETA implementation phase the related matter of the release of day ahead Physical Notification data was considered by BSEG (Balancing Services Expert Group). Similar issues were involved relating to the provision of operational information to the System Operator, the need for confidentiality of individual market participants, and the release of information to the market. The agreed position at the end of this debate in BSEG was the current BMRS day ahead information provision on margins which includes national data and information on five zones.

Nigel Brooks
6 July 2001